

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

MARTIN D. BORST,  
Debtor.

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Case No. 1:24-bk-02783-MJC  
Chapter 13

**VERIFIED MOTION TO EXTEND THE AUTOMATIC STAY**

Debtor, by and through undersigned counsel, pursuant to 11 U.S.C. § 362(c)(3), hereby files this *Verified Motion to Extend the Automatic Stay*. In support thereof, Debtor states as follows:

1. Debtor filed this Chapter 13 bankruptcy petition on October 29, 2024.
2. On June 26, 2024, Debtor filed Bankruptcy Case No. 5:24-bk-01589-MJC (“Prior Case”), in the United States Bankruptcy Court, Middle District of Pennsylvania, Harrisburg Division, under Chapter 13. The Prior Case was subsequently voluntarily dismissed on July 17, 2024.
3. Debtor did not have any prior cases dismissed in the past year for any of the following reasons:
  - a. failure to file or amend required documents without substantial excuse;
  - b. failure to provide adequate protection as ordered by the Court; or
  - c. failure to perform the terms of a plan confirmed by the Court.
4. There has been a substantial change in the Debtor’s circumstances since the dismissal of the Prior Case. Debtor’s prior case was filed pro se and Debtor had difficulty navigating the bankruptcy process and completing all of the required paperwork. Debtor has now hired the undersigned to represent him in this matter.
5. Debtor has filed all required Schedules and Statements and a Chapter 13 Plan in this case.

WHEREFORE, the Debtor requests this Court grant this Motion, indefinitely extend the automatic stay as to all creditors, and for any other relief deemed fair and just.

GINSBURG LAW GROUP, P.C.

/s/ Amy Lynn Bennecoff Ginsburg  
653 W. Skippack Pike, Suite 300-71  
Blue Bell, PA 19402  
T: (855) 978-6564  
F: (855) 777-0043  
E: efilings@ginsburglawgroup.com  
Attorney for Debtor

**DEBTOR'S VERIFICATION**

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: December 13, 2024

  
Martin D. Borst, Debtor

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on or before December 13, 2024, a true and correct copy of the foregoing was furnished via electronic or regular mail to the parties listed on the attached mailing matrix.

GINSBURG LAW GROUP, P.C.

/s/ Amy Lynn Bennecoff Ginsburg  
653 W. Skippack Pike, Suite 300-71  
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E: efilings@ginsburglawgroup.com  
Attorney for Debtor

Label Matrix for local noticing  
0314-1  
Case 1:24-bk-02783-MJC  
Middle District of Pennsylvania  
Harrisburg  
Thu Oct 31 16:56:31 EDT 2024

Chicago Public Schools  
16355 Lagoon Canyon Rd  
Irvine, CA 92618-3801

Dental First Financing Credit Card  
PO Box 182120  
Columbus, OH 43218-2120

Select Portfolio Servicing  
PO Box 65250  
Salt Lake City, UT 84165-0250

United States Trustee  
US Courthouse  
1501 N. 6th St  
Harrisburg, PA 17102-1104

(p)JACK N ZAHAROPOULOS  
ATTN CHAPTER 13 TRUSTEE  
8125 ADAMS DRIVE SUITE A  
HUMMELSTOWN PA 17036-8625

U.S. Bankruptcy Court  
Sylvia H. Rambo US Courthouse  
1501 N. 6th Street  
Harrisburg, PA 17102-1104

Corporate America Credit Union  
970 Oaklawn Ave #3  
Elmhurst, IL 60126-1059

(p)LENDMARK FINANCIAL SERVICES  
2118 USHER ST  
COVINGTON GA 30014-2434

Synchrony Bank/Lowes  
PO Box 530914  
Atlanta, GA 30353-0914

Wilmington Savings Fund Society FSB  
6061 S Willow Dr., Suite 300  
Englewood, CO 80111-5151

Martin D. Borst  
52 Robin Circle  
Wysox, PA 18854-7966

American Credit Acceptance  
961 E Main St  
Spartanburg, SC 29302-2149

Corporate America Federal Credit Union  
4365 Crescent Road  
Birmingham, AL 35210-1774

Milstead & Associates, LLC  
1 E. Stow Road  
Marlton, NJ 08053-3118

The Bank of Missouri/FPL  
5 Concourse Parkway  
Atlanta, GA 30328-5350

Amy Lynn Bennecoff Ginsburg  
Ginsburg Law Group, P.C.  
653 W. Skippack Pike  
Suite 300-71  
Blue Bell, PA 19422-1738

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Lendmark  
P.O. Box 80845  
Conyers, GA 30013

Jack N Zaharopoulos  
Standing Chapter 13  
(Trustee)  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

End of Label Matrix	
Mailable recipients	16
Bypassed recipients	0
Total	16